



John J. Brown Jr., Director

OFFICE OF EMERGENCY MANAGEMENT  
1400 N. Uhle Street, Suite 300, Arlington, Virginia 22201  
TEL 703.228.7935 FAX 703.228.3667 [www.arlingtonva.us](http://www.arlingtonva.us)

November 4, 2014

**Ex Parte**

The Honorable Tom Wheeler  
Chairman, Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

*Re: Telephone Number Portability, et al., CC Docket No. 95-116, WC Docket 09-109*

Dear Chairman Wheeler:

As the Director of the Arlington County, Virginia Office of Emergency Management, I am writing to express my deep concern at the possible interruption, degradation, or cancellation of essential public safety services associated with the Local Number Portability Administrator (LNPA). Of concern also is the potential that public safety services could become fee-for-service operations. As you know, a vendor for LNPA services is currently being procured.

Arlington County sits directly across the Potomac River from Washington DC, and is home to critical infrastructure including the Pentagon, Ronald Reagan National Airport, and many other national security government and contractor facilities.

The current LNPA provides a service whereby 9-1-1 databases are updated regularly against LNPA data, to flag any users who have recently ported their service. This allows 9-1-1 providers to ensure that their own data remains up-to-date. Without this service, if someone who had recently changed phone carriers or their method of service (landline, VoIP, wireless) called 9-1-1, and for whatever reason they were not able to provide their callback number, location, or other key information to the operator, 9-1-1 could be severely challenged in locating them. And with a 9-1-1 call, every second counts – and any failed call could be a tragedy.

I do not write to promote any particular LNPA vendor over another. But I do hope that the FCC will require that any vendor awarded the LNPA contract will be explicitly required to continue this 9-1-1 synchronization service at its current capacity and without interruption, and that demonstration of their capability to provide this service be formally presented in the proposal of any firm awarded the LNPA contract.



John J. Brown Jr., Director

OFFICE OF EMERGENCY MANAGEMENT  
1400 N. Uhle Street, Suite 300, Arlington, Virginia 22201  
TEL 703.228.7935 FAX 703.228.3667 [www.arlingtonva.us](http://www.arlingtonva.us)

In so doing, I join my colleagues at the Oklahoma Corporation Commission, NENA, Intrado, TCS, and others who have argued for the importance of this service.

Furthermore, this essential public safety function provided by the LNPA helps save lives. The Arlington County Office of Emergency Management and others who rely on 9-1-1 – including Arlington County Fire and Arlington County Police – are constantly being asked to do more with less. Our focus should be on saving lives. It would be a significant and unacceptable burden if we were to be forced to pay new fees, whether on a subscription or per-use basis, simply to maintain our current confidence that 9-1-1 will work as it should.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "John J. Brown, Jr.", with a large, stylized flourish at the end.

John J. Brown, Jr.

cc: Daniel Alvarez  
Rebekah Goodheart  
David Goldman  
Nicholas Degani  
Amy Bende  
Julie Veach  
Jonathan Sallet  
Rear Admiral David Simpson (USN, ret.)  
Lisa Gelb  
Michele Ellison  
Ken Moran  
Diane Griffin-Holland  
Ann Stevens  
Sanford Williams